UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

| LIVE NATION MERCHANDISE, INC., |)) |
|--|---------------------------------------|
| Plaintiff, |)) CIVIL ACTION NO. 1:19-cv-11716 |
| vs. | |
| JOHN DOES 1-100, JANE DOES 1-100, and XYZ COMPANY, |))) |
| Defendants. |)) |

NOTICE OF RELATED CASES

Plaintiff Live Nation Merchandise, Inc. ("Plaintiff") hereby files this Notice of Related Cases. Plaintiff notifies the court that this matter is related to other matters either currently pending or previously brought before Judge Rya W. Zobel and should be brought before this same judge by virtue of the same and similar parties, substantially the same issues of facts and law are involved, and that there will be a substantial saving of judicial resources from assigning this case to the same judge. See Local Rule 40.1 (g).

For Plaintiff and other Similarly Situated Plaintiffs Against Defendant Bootleggers: Live Nation Merchandise, Inc. v. Does, Case No. 17-cv-11041 RWZ (D. MA 2017) (Judge Zobel) (for Dead & Company's tour); Live Nation Merchandise, Inc. v. Does, Case No. 17-cv-11381 RWZ (D. MA 2017) (Judge R. Zobel) (for Coldplay's tour); Bravado International Group Merchandising Services, Inc. v. Does, Case No. 19-cv-10455 RWZ (D. MA 2019) (Judge Zobel) (for Ariana Grande's tour); Araca Merchandise, L.P. v. Does, Case No. 18-cv-10648 RWZ (D. MA 2018) (Judge Zobel) (for Pink's tour); Three Ten Merchandising Services, Inc. v. Does, Case No. 18-cv-11605 RWZ (D. MA 2018) (Judge Zobel) (for Beyoncé's tour); Blackout Merch v. Does, Case

No. 17-cv-11799 RWZ (D. MA 2017) (Judge Zobel) (for Katy Perry's tour); and Bravado

International Group Merchandising Services, Inc. v. Does, Case No. 17-cv-11560 RWZ (D. MA

2017) (Judge Zobel) (for Lady Gaga's tour).

The prior matters, like this newly filed matter, involve the actions of Defendants who sell

infringing merchandise at the concerts of a performer which has licensed her/his/their trademarks,

service marks, likenesses, logos and other indicia to Plaintiff and other similar situated plaintiff

merchandisers. Plaintiff and other similarly situated plaintiffs have filed these actions to enjoin

defendants and to seize the infringing merchandise at performer's concerts in this District and

elsewhere during the performer's tours.

Therefore Plaintiff respectfully requests that this action be heard by the Honorable Judge

Zobel, who is the same judge assigned to the other actions for Plaintiff and other similarly situated

plaintiffs.

Dated: August 8, 2019

Respectfully Submitted

LIVE NATION MERCHANDISE, INC.

By Its Attorneys

/s/ M. Lawrence Oliverio

M. Lawrence Oliverio, Esq., BBO #378755

loliverio@polsinelli.com

Polsinelli, PC

One International Plaza, Ste 3900

Boston, MA 02110

Tel: (617) 406-0335; Fax: (617) 367-4656

Cara R. Burns, Esq. (CA Bar # 137557)

Hicks, Mims, Kaplan & Burns

cburns@hmkblawyers.com

28202 Cabot Rd, Suite 300

Laguna Niguel, CA 92677

Tel: (310) 314-1721; Fax: (310) 314-1725

2